

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	
Christopher Robinson	:	
	:	Chapter 13
	:	
	:	
Debtor	:	No.: 18-15282

RESPONSE OF DEBTOR TO THE MOTION FOR RELIEF OF AUTOMATIC
STAY FILED BY AMERICREDIT FINANCIAL SERVICES, INC.

COMES NOW, Debtor, Christopher Robinson, hereinafter referred to as “Debtor,” by and through his undersigned Counsel, Brad J. Sadek, Esquire, and in response to the Motion for Relief filed by Americredit Financial Services, INC “Movant”, and hereby avers the following:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Denied.
6. Denied. By way of further response, it is specifically requested that undersigned Counsel be provided with a post-petition payment history.
7. Denied.

WHEREFORE, based on the aforementioned, Movant shall be denied an Order modifying the Automatic Stay under Bankruptcy Code Section 362.

Respectfully submitted,

Dated: January 3, 2019

/s/ Brad J. Sadek, Esq.
Attorney for the Debtor
Sadek & Cooper
1315 Walnut Street, #502
Philadelphia, PA 19107
(215) 545-0008